

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

WILLIAM C. BOND,

*

Plaintiff

*

v.

*

Civil Action No.: MJG-01-CV-2600

KENNETH BLUM, SR., *et al.*,

*

Defendants

*

* * * * *

MOTION FOR PROTECTIVE ORDER
CONCERNING DEPOSITION OF AUGUST 14, 2003

Now comes William C. Bond, Plaintiff, and states as follows:

1. On August 14, 2003, the Judgment Creditor, Adelberg, Rudow, Dorf & Hendler, LLC (hereafter "Adelberg"), conducted a deposition of Bond's counsel, namely undersigned counsel in his individual capacity and in the capacity as corporate designee for Schulman & Kaufman, LLC.

2. During the course of the deposition, a number of issues arose as to whether the questions were so far afield as to be clearly outside the confines of Federal Rule of Civil Procedure 26(b)(1) or otherwise not subject to disclosure because of the work product rule or attorney/client privilege. Deponent did not refuse to answer the questions but requested that interrogating counsel seek a ruling from the Court. Interrogating counsel decided to do so collectively. *See* August 14, 2003 transcript, Tr. 17-18, 49.

3. At the commencement of the afternoon session of the deposition, counsel for Adelberg contacted Magistrate Judge Bredar who requested that the parties brief the

matter, with the deponent taking the initiative.

4. The Deponent has set forth in a separate Memorandum preceded by an introduction the specific questions and the rationale for sustaining the objections to those questions.

5. Copies of the deposition and exhibits thereto are being filed under seal.

WHEREFORE, for the aforementioned reasons, and those stated in the accompanying Memorandum of Law in support of the Motion of Schulman & Kaufman, LLC and Howard J. Schulman for a Protective Order, the undersigned on behalf of himself and Schulman & Kaufman, LLC, respectfully requests that the Court grant the Motion for Protective Order and that the Court sustain the objections to questions 1 through 22.

Howard J. Schulman
Schulman & Kaufman, LLC
One Charles Center, Suite 600
100 N. Charles Street
Baltimore, Maryland 21201
(410) 576-0400
Attorneys for Plaintiff